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10 Attorneys for Plaintiff, Maisara Rahman  
11  
12

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
15 EASTERN DIVISION  
16

17 Maisara Rahman,

18 Plaintiff,

19 vs.  
20

21 Pioneer Credit Recovery, Inc.; and DOES  
1-10, inclusive,  
22

23 Defendants.  
24

Case No.:

**COMPLAINT FOR DAMAGES**  
**1. VIOLATION OF FAIR DEBT**  
**COLLECTION PRACTICES ACT,**  
**15 U.S.C. § 1692 ET. SEQ;**  
**2. VIOLATION OF FAIR DEBT**  
**COLLECTION PRATICES ACT,**  
**CAL.CIV.CODE § 1788 ET. SEQ.**

**JURY TRIAL DEMANDED**

1 For this Complaint, the Plaintiff, Maisara Rahman, by undersigned counsel,  
2 states as follows:  
3

4 **JURISDICTION**

5 1. This action arises out of Defendants' repeated violations of the Fair Debt  
6 Collection Practices Act, 15 U.S.C. § 1692, et seq. ("FDCPA"), and the invasions of  
7 Plaintiff's personal privacy by the Defendants and its agents in their illegal efforts to  
8 collect a consumer debt.  
9

10 2. Supplemental jurisdiction exists pursuant to 28 U.S.C. § 1367.  
11

12 3. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b), in that  
13 Defendants transact business here and a substantial portion of the acts giving rise to  
14 this action occurred here.  
15

16 **PARTIES**

17 4. The Plaintiff, Maisara Rahman (hereafter "Plaintiff"), is an adult  
18 individual residing in San Jacinto, California, and is a "consumer" as the term is  
19 defined by 15 U.S.C. § 1692a(3).  
20

21 5. Defendant, Pioneer Credit Recovery, Inc. ("Pioneer"), is a New York,  
22 business entity with an address of 26 Edward Street, Arcade, New York 14009,  
23 operating as a collection agency, and is a "debt collector" as the term is defined by 15  
24 U.S.C. § 1692a(6).  
25  
26  
27  
28

1           6. Does 1-10 (the “Collectors”) are individual collectors employed by  
2 Pioneer and whose identities are currently unknown to the Plaintiff. One or more of  
3 the Collectors may be joined as parties once their identities are disclosed through  
4 discovery.  
5

6           7. Pioneer at all times acted by and through one or more of the Collectors.  
7

8                           **ALLEGATIONS APPLICABLE TO ALL COUNTS**  
9

10          **A. The Debt**

11           8. The Plaintiff allegedly incurred a financial obligation in the approximate  
12 amount of \$127,000.00 for a student loan (the “Debt”) to Sallie Mae (the “Creditor”).  
13

14           9. The Debt arose from services provided by the Creditor which were  
15 primarily for family, personal or household purposes and which meets the definition  
16 of a “debt” under 15 U.S.C. § 1692a(5).  
17

18           10. The Debt was purchased, assigned or transferred to Pioneer for  
19 collection, or Pioneer was employed by the Creditor to collect the Debt.  
20

21           11. The Defendants attempted to collect the Debt and, as such, engaged in  
22 “communications” as defined in 15 U.S.C. § 1692a(2).  
23

24          **B. Pioneer Engages in Harassment and Abusive Tactics**  
25

26           12. Within the last year, Pioneer contacted Plaintiff in an attempt to collect  
27 the Debt.  
28

1           13. Pioneer called Plaintiff's place of employment, a hospital, in an attempt  
2 to collect the Debt.

3  
4           14. Pioneer disclosed the nature of the calls to Plaintiff's co-workers and told  
5 Plaintiff's co-workers that Plaintiff owes money, causing great deal of embarrassment  
6 to Plaintiff.

7  
8           15. Pioneer contacted Plaintiff's chief-of-staff of the hospital at his home in  
9 an attempt to collect the Debt. Pioneer disclosed the information about Plaintiff's Debt  
10 to the chief-of-staff, causing a huge amount of embarrassment to Plaintiff and causing  
11 Plaintiff to fear that her employment could be in jeopardy.

12  
13           16. Pioneer called chief's house on several occasions without being asked to  
14 do so.

15  
16           17. Plaintiff called Pioneer and left a voice message asking that Pioneer stop  
17 calling her place of employment and her co-workers. Plaintiff further provided  
18 Pioneer with her cellular number and address for future communications. Plaintiff  
19 further instructed Pioneer to cease all calls to her workplace and advised Pioneer that  
20 Plaintiff's employment could be in jeopardy.

21  
22           18. Pioneer thereafter continued calling Plaintiff's workplace and Plaintiff's  
23 co-workers in an attempt to collect the Debt.

24  
25           19. Pioneer called Plaintiff's work place at an excessive rate, placing three to  
26 four calls daily with intent to annoy and harass Plaintiff.  
27  
28

1           20. Pioneer left numerous voice messages disclosing the information about  
2 the Debt at Plaintiff's work number and left numerous "urgent" messages with  
3 Plaintiff's secretary.  
4

5           21. On one occasion, Pioneer threatened to call secretary's supervisor and  
6 "get her in trouble" if secretary did not put Plaintiff on the phone immediately.  
7

8           22. Furthermore, in one of the voice messages left at Plaintiff's work,  
9 Pioneer threatened to garnish Plaintiff's wages if Plaintiff did not call Pioneer back in  
10 30 minutes.  
11

12           23. Pioneer had no present legal ability to affect an immediate garnishment  
13 without first providing Plaintiff with the proper notices as required by law.  
14

15           24. Plaintiff offered to make small monthly payments toward the Debt.  
16 Pioneer refused to accept Plaintiff's offer and demanded payments in greater amounts,  
17 which Plaintiff could not afford.  
18

19           25. Pioneer failed to provide Plaintiff with any written correspondence  
20 regarding the Debt, even after Plaintiff's requests for documentation.  
21

22 **C. Plaintiff Suffered Actual Damages**

23           26. The Plaintiff has suffered and continues to suffer actual damages as a  
24 result of the Defendants' unlawful conduct.  
25  
26  
27  
28



1           34. The Defendants engaged in behavior the natural consequence of which  
2 was to harass, oppress, or abuse the Plaintiff in connection with the collection of a  
3 debt, in violation of 15 U.S.C. § 1692d.  
4

5           35. The Defendants caused a phone to ring repeatedly and engaged the  
6 Plaintiff in telephone conversations, with the intent to annoy and harass, in violation  
7 of 15 U.S.C. § 1692d(5).  
8

9           36. The Defendants threatened the Plaintiff with garnishment if the debt was  
10 not paid, in violation of 15 U.S.C. § 1692e(4).  
11

12           37. The Defendants used unfair and unconscionable means to collect a debt,  
13 in violation of 15 U.S.C. § 1692f.  
14

15           38. The Defendants failed to send Plaintiff an initial letter within five days of  
16 its initial contact with Plaintiff as required by law, in violation of 15 U.S.C. §  
17 1692g(a).  
18

19           39. The foregoing acts and omissions of the Defendants constitute numerous  
20 and multiple violations of the FDCPA, including every one of the above-cited  
21 provisions.  
22

23           40. The Plaintiff is entitled to damages as a result of the Defendants'  
24 violations.  
25  
26  
27  
28

**COUNT II**  
**VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION**  
**PRACTICES ACT, Cal. Civ. Code § 1788 et seq.**

41. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

42. The Rosenthal Fair Debt Collection Practices Act, California Civil Code section 1788 et seq. (“Rosenthal Act”) prohibits unfair and deceptive acts and practices in the collection of consumer debts.

43. Pioneer Credit Recovery, Inc., in the regular course of business, engages in debt collection and is a “debt collector” as defined by Cal. Civ. Code § 1788.2(c).

44. The Defendants threatened the Plaintiff with garnishment or attachment of his wages if the debt was not paid, without intending to institute such proceedings, in violation of Cal. Civ. Code § 1788.10(e).

45. The Defendants caused a telephone to ring repeatedly and engaged the Plaintiff in continuous conversations with an intent to annoy the Plaintiff, in violation of Cal. Civ. Code § 1788.11(d).

46. The Defendants communicated with the Plaintiff with such frequency as to be considered harassment, in violation of Cal. Civ. Code § 1788.11(e).

47. The Defendants failed to comply with the provisions of 15 U.S.C. § 1692, et seq., in violation of Cal. Civ. Code § 1788.13(e).





1           55. The telephone calls made by the Defendants to Plaintiff were so  
2 persistent and repeated with such frequency as to be considered, "hounding the  
3 plaintiff," and, "a substantial burden to her existence," thus satisfying the Restatement  
4 of Torts, Second, § 652B requirement for an invasion of privacy.  
5

6           56. The conduct of the Defendants in engaging in the illegal collection  
7 activities resulted in multiple invasions of privacy in such a way as would be  
8 considered highly offensive to a reasonable person.  
9

10           57. As a result of the intrusions and invasions, the Plaintiff is entitled to  
11 actual damages in an amount to be determined at trial from the Defendants.  
12

13           58. All acts of the Defendants and its agents were committed with malice,  
14 intent, wantonness, and recklessness, and as such, the Defendants are subject to  
15 punitive damages.  
16

17  
18                                   **COUNT IV**  
19                                   **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

20           59. The Plaintiff incorporates by reference all of the above paragraphs of this  
21 Complaint as though fully set forth herein at length.

22           60. The acts, practices and conduct engaged in by the Defendants vis-à-vis  
23 the Plaintiff was so outrageous in character, and so extreme in degree, as to go beyond  
24 all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable  
25 in a civilized community.  
26  
27  
28



1 D. Actual damages pursuant to Cal. Civ. Code § 1788.30(a);

2 E. Statutory damages of \$1,000.00 for knowingly and willfully committing  
3 violations pursuant to Cal. Civ. Code § 1788.30(b);  
4

5 F. Actual damages from the Defendants for the all damages including  
6 emotional distress suffered as a result of the intentional, reckless, and/or  
7 negligent FDCPA violations and intentional, reckless, and/or negligent  
8 invasions of privacy and intentional infliction of emotional distress in an  
9 amount to be determined at trial for the Plaintiff;  
10  
11


12 G. Punitive damages; and

13 H. Such other and further relief as may be just and proper.  
14

15 **TRIAL BY JURY DEMANDED ON ALL COUNTS**  
16

17 DATED: August 2, 2012

TAMMY HUSSIN

18  
19 

20 By: \_\_\_\_\_

21 Tammy Hussin, Esq.

22 Lemberg & Associates, LLC

23 Attorney for Plaintiff, Maisara Rahman  
24  
25  
26  
27  
28

# ORIGINAL

## UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

**I (a) PLAINTIFFS** (Check box if you are representing yourself ☐)

Maisara Rahman

**DEFENDANTS**

Pioneer Credit Recovery, Inc.

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

Tammy Hussin, 6404 Merlin Drive, Carlsbad, CA 92011  
855-301-2300 X 5514

Lemberg & Associates, 1100 Summer St 3rd Fl Stamford CT 06905 2036532250

**Attorneys (If Known)****II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only**  
(Place an X in one box for plaintiff and one for defendant.)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. ORIGIN** (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)**CLASS ACTION under F.R.C.P. 23:** ☐ Yes ☒ No**MONEY DEMANDED IN COMPLAINT:** \$ Damages, fees, costs**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

15 U.S.C. 1692 - Violations of the Fair Debt Collection Practices Act

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 540 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE / PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

**ED CV 12 - 01288****VAP****(DTBx)**

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes  
If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes  
If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
County of Riverside	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).


County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	State of New York

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
County of Riverside	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note:** In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date August 2, 2012

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Virginia A. Phillips and the assigned discovery Magistrate Judge is David T. Bristow.

The case number on all documents filed with the Court should read as follows:

**EDCV12- 1283 VAP (DTBx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☐ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.